

UNITED STATES FEDERAL COMMUNICATIONS COMMISSION

In Re Applications of:)

RONALD BRASHER, LICENSEE OF)
PRIVATE LAND MOBILE STATIONS)
WPLQ202, KCG967, WPLD495,)
WPKH771, WPK1739, WPK1733,)
WPK1707, WIL990, WPLQ475,)
WPLY658, WPKY903, WPKY901,)
WPLZ433, WPK1762, AND WPDU262,)
DALLAS/FORT WORTH, TEXAS, et al.,)

Docket No. 00-156

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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Room No. TW-A-363
Federal Communications
Commission
445 12th Street, S.W.
Washington, D.C.

Thursday,
March 1, 2001

The parties met, pursuant to the notice of the
Judge, at 9:00 a.m.

BEFORE: HONORABLE ARTHUR I. STEINBERG
Judge

APPEARANCES:

On behalf of Ronald Brasher, Patricia Brasher,
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DLB:

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I N D E X

<u>WITNESSES:</u>	<u>DIRECT</u>	<u>CROSS</u>	<u>REDIRECT</u>	<u>RECROSS</u>	<u>VOIR DIRE</u>
Thomas R. Lewis	680	--	740	--	--
by Atty. Romney	--	715	--	744	--
by Atty. Pedigo	--	731	--	746	--
Patricia A. Brasher	751	--	894	--	--
	--	--	898	--	--
by Atty. Romney	--	876	--	897	--
by Atty. Pedigo	--	890	--	897	--

P R O C E E D I N G S

(9:00 a.m.)

JUDGE STEINBERG: We are on the record now.

Ms. Lancaster, please call your next witness.

MS. LANCASTER: Your Honor, we call Mr. Thomas Lewis, and Mr. Knowles-Kellett will be questioning Mr. Lewis.

JUDGE STEINBERG: Okay. Would you please stand, Mr. Lewis, and raise your right hand?

Whereupon,

THOMAS LEWIS

having been duly sworn, was called as a witness and was examined and testified as follows:

JUDGE STEINBERG: Please be seated. Thank you.

THE REPORTER: Mr. Lewis, could you please pull the mike rather close to you? Thank you.

DIRECT EXAMINATION

BY MR. KNOWLES-KELLETT:

Q Good morning, Mr. Lewis. My name is Bill Knowles-Kellett, and I'll be asking you some questions today.

We're here in an FCC proceeding involving FCC licenses held by Ronald Brasher and others. Are you familiar with this?

A Right.

Q Okay. Do you recall having your deposition done

1 in November?

2 JUDGE STEINBERG: Why don't you get the witness'
3 name and address on the record first?

4 MR. KNOWLES-KELLETT: Okay.

5 BY MR. KNOWLES-KELLETT:

6 Q Please state your full name and address for the
7 record.

8 A Thomas Roscoe Lewis. Address, 2760 Rains County
9 Road 2400, Emory, Texas.

10 Q Okay. What is your home phone number?

11 A (903) 473-0039.

12 Q And where are you employed?

13 A Metroplex Two Way Radio.

14 Q Okay. And where is Metroplex Two Way Radio?

15 A That's in Dallas, Texas.

16 Q Okay. How long have you worked at Metroplex?

17 A Approximately around seven years.

18 Q Okay. Do you recall having your deposition done
19 in November?

20 A Yes, I do.

21 Q Okay. So the same rules we talked about there
22 apply here. You have to give verbal responses because the
23 court reporter is taking it all down.

24 A Right.

25 Q Okay. Now, What do you do for Metroplex Two Way

1 Radio?

2 A I service the DART vehicles in Dallas.

3 Q Okay. What is DART?

4 A DART is Dallas Rapid Transit system.

5 Q Okay. Who is your supervisor?

6 A Keith Krohn.

7 Q Okay. And what is his title?

8 A I believe he is the shop supervisor, I guess.

9 That's what I'd call him.

10 Q Okay. What is your title?

11 A I'm a tech.

12 Q Okay. How many hours a week do you work?

13 A Forty hours a week.

14 Q Okay. Are you related to -- okay. Who are the
15 officers of DLB?

16 A David and Diane Brasher.

17 Q Okay. Are you aware that Ronald and Patricia are
18 officers as well?

19 A I believe they're supposed to be the president and
20 vice-president.

21 Q Okay. Are you related to those people?

22 A Yes, I am.

23 Q Could you please --

24 THE REPORTER: Excuse me for interrupting. I am
25 sorry. It is very important to wait until the questions are

1 completed before you answer because I'm taping it, and it
2 overlaps.

3 THE WITNESS: Yes, sir.

4 THE REPORTER: Thank you.

5 BY MR. KNOWLES-KELLETT:

6 Q Okay. Could you explain the family relationship?

7 A Ronald is my brother-in-law, Patsy is my sister,
8 David is my nephew and his wife.

9 Q Okay. Okay. I'd like you to turn, if you would,
10 in the book to Exhibit 65.

11 A Okay. To what page?

12 Q To Tab 65. Take a minute and look at that
13 document. See if you recognize it. My question is do you
14 recognize it?

15 A It looks like the paperwork I signed for the
16 license.

17 Q Okay. When you say paperwork I signed for the
18 license, what type of license do you hold?

19 A A 900.

20 Q A 900 megahertz license?

21 A Right.

22 Q And do you know what that license authorizes?

23 A No, not right offhand I don't.

24 Q Okay. Do you see on the second page it says
25 Thomas Lewis, d/b/a Lewis Wrecking Service at the top?

1 A Yes. Here it is. I found it.

2 Q Okay. And is that your address?

3 A That's my old address. They've changed the
4 address since then.

5 Q Okay. When did you change addresses?

6 A They changed it last year. They went so everybody
7 could be found.

8 Q Okay.

9 A On these route numbers you can't be found. They
10 don't hold you to a street number, so they put you a street
11 number on the new addresses.

12 Q Okay. When you say they, you mean the U.S. Postal
13 Service --

14 A Yes, the Postal Service.

15 Q -- changed addresses?

16 JUDGE STEINBERG: It's hard to get your mail if
17 they can't find you.

18 THE WITNESS: That's right.

19 BY MR. KNOWLES-KELLETT:

20 Q Okay. And Lewis Wrecking Service? You operate
21 Lewis Wrecking Service?

22 A No, sir, I don't.

23 Q Okay. Do you have mobile radios?

24 A Yes, I do. I have them in both my vehicles.

25 Q Okay. So you have two mobile radios? Is that

1 correct?

2 A Yes, it is.

3 JUDGE STEINBERG: Let me ask you. In about
4 November, 1997, did you operate Lewis Wrecking Service?

5 THE WITNESS: Well, I've hauled cars, but I don't
6 have a wrecker or anything like that.

7 JUDGE STEINBERG: Okay.

8 THE WITNESS: I've got a trailer.

9 JUDGE STEINBERG: Did you ever have a company --

10 THE WITNESS: No, sir.

11 JUDGE STEINBERG: Did you ever work for a company
12 or own a company called Lewis Wrecking Service?

13 THE WITNESS: No, sir.

14 JUDGE STEINBERG: And when you hauled stuff
15 around --

16 THE WITNESS: No, sir.

17 JUDGE STEINBERG: -- did you call yourself Lewis
18 Wrecking Service?

19 THE WITNESS: No, sir.

20 JUDGE STEINBERG: Do you know where the name Lewis
21 Wrecking Service came from?

22 THE WITNESS: I believe it come from this
23 document.

24 BY MR. KNOWLES-KELLETT:

25 Q Do you know why you have this license?

1 A Well, the reason that I got this license is my
2 brother-in-law asked me to sign for the license.

3 Q By your brother-in-law, do you mean Ronald
4 Brasher?

5 A Ronald Brasher.

6 Q Okay. Did he tell you why he was asking you to
7 sign for the license?

8 A That he needed them is all I know.

9 Q Okay. So it was not for your wrecking service,
10 but instead for some DLB purpose?

11 MR. ROMNEY: Objection. Leading, Your Honor.

12 MR. KNOWLES-KELLETT: I'll rephrase.

13 JUDGE STEINBERG: Okay.

14 BY MR. KNOWLES-KELLETT:

15 Q Can you tell me the purpose for which this license
16 was used? What company was using this license?

17 MR. ROMNEY: I'm sorry, Your Honor. Objection.
18 Compound question. He changed questions in midstream.

19 MR. KNOWLES-KELLETT: Okay. I'll correct it.

20 BY MR. KNOWLES-KELLETT:

21 Q What company was using this license?

22 A As far as I know, Metroplex Two Way Radio.

23 Q Okay. And do you see just below the address there
24 is a thing that says MO-30 authorizing 30 mobiles on this
25 license?

1 MR. ROMNEY: Objection, Your Honor. Leading.

2 JUDGE STEINBERG: Why don't you ask if the witness
3 knows what --

4 MR. KNOWLES-KELLETT: Okay.

5 JUDGE STEINBERG: What page are you on, please?

6 MR. KNOWLES-KELLETT: The second page of the
7 exhibit under FrequenCIES. It says 900.1375, MO-30.

8 JUDGE STEINBERG: Okay. Let Mr. Lewis get to
9 that.

10 Do you see where it says that, Mr. Lewis?

11 THE WITNESS: It's on the second page?

12 JUDGE STEINBERG: The second page, 900.13750.

13 MR. KNOWLES-KELLETT: Under the comment --

14 JUDGE STEINBERG: Why don't you help the witness?

15 MR. KNOWLES-KELLETT: Right here.

16 JUDGE STEINBERG: Where it says MO.

17 THE WITNESS: Okay.

18 BY MR. KNOWLES-KELLETT:

19 Q Do you recognize what that means?

20 A As far as I would say, it would be 30 radios.

21 Q Okay. Do you have any purpose to have 30 radios?

22 A No, sir, I don't.

23 Q Okay. Have you ever had 30 radios?

24 A No, sir, I haven't.

25 Q Okay. What is the most you have ever had?

1 A Two.

2 Q Okay. Going back to the first page of the
3 exhibit, is that your signature on that page?

4 A I believe so.

5 Q Okay. On the third page of the exhibit it is
6 entitled Application for Renewal of Present Radio License.
7 Is the signature at the bottom of the page yours?

8 A Yes.

9 Q And the date? Is there a date?

10 A As far as I know it is.

11 Q Okay. And the fourth page of the exhibit? Is
12 that check signed by you?

13 A Yes, it is.

14 Q On your personal account?

15 A Yes, it is.

16 Q Okay. Did you pay that fee to the FCC?

17 A Well, Ronald gave me the money, and he told me
18 since the license was in my name it should be coming from my
19 address.

20 Q Okay.

21 A So I signed a check, and he give me the money.

22 Q Okay. And this is a renewal of the license? Is
23 that correct?

24 A Right.

25 Q When you first got the license, did you --

1 JUDGE STEINBERG: While we are on the money, what
2 did he give you?

3 THE WITNESS: He give me five \$20s and a \$10.

4 JUDGE STEINBERG: Five \$20 bills --

5 THE WITNESS: Right.

6 JUDGE STEINBERG: -- and a \$10?

7 THE WITNESS: And a \$10.

8 JUDGE STEINBERG: Do you remember if they were the
9 new \$20s with the big picture or the old \$20s with the
10 little picture?

11 THE WITNESS: No.

12 BY MR. KNOWLES-KELLETT:

13 Q Okay. When you first applied for this license,
14 did you pay the fee the same way?

15 A No, I don't believe I did.

16 Q Okay. How was it paid?

17 A I believe Metroplex paid it.

18 Q Okay. Who prepared the application?

19 A I believe Ron did.

20 MR. ROMNEY: Objection, Your Honor. Which
21 application?

22 MR. KNOWLES-KELLETT: Okay. The renewal
23 application.

24 THE WITNESS: I believe Ronald did.

25 //

1 BY MR. KNOWLES-KELLETT:

2 Q Okay. How did you come to believe that Ronald
3 did?

4 A Well, he's the one that handed it to me to get it
5 signed.

6 Q Okay. Who prepared your first application?

7 A I believe Patsy and Ronald. I used to pick up my
8 vehicle at Ronald's and Pat's at that time because I was on
9 a night shift, and then Ronald used the same vehicle.

10 Q Okay.

11 A So I picked it up at his house, and we signed the
12 papers there.

13 Q Okay. Let me see if I understand that. You just
14 think Ronald prepared it because he's the one who presented
15 it to you?

16 A Right.

17 Q Okay. Did you understand when you applied for
18 this license that you were asking to operate 30 mobile
19 units?

20 A No, I wasn't.

21 Q Okay. Did you read the license application?

22 A No, I didn't. I just -- he said sign this. I
23 signed it.

24 Q Okay. Did you discuss this application with
25 anybody else at DLB?

1 A I discussed it with my sister after I signed it.

2 Q Okay. Did you discuss it with anybody else?

3 A No, I haven't.

4 Q Okay. Which sister did you discuss it with?

5 A Carolyn Lutz.

6 Q Okay. Did you talk to her at or about the time
7 you signed it?

8 A It was about the same time. After. It was after
9 I signed it.

10 Q Okay. Okay.

11 JUDGE STEINBERG: Did you want to ask what they
12 discussed now that you found out that there was a
13 discussion? It's up to you.

14 MR. KNOWLES-KELLETT: Carolyn Lutz was --

15 JUDGE STEINBERG: No. I don't want you to tell
16 me.

17 MR. KNOWLES-KELLETT: Okay.

18 JUDGE STEINBERG: I don't want you to tell the
19 witness what Carolyn Lutz told you.

20 MR. KNOWLES-KELLETT: Okay.

21 JUDGE STEINBERG: It's up to yo. Whatever you
22 want to do.

23 BY MR. KNOWLES-KELLETT:

24 Q What did you discuss with Carolyn Lutz?

25 MR. ROMNEY: Objection, Your Honor. Hearsay.

1 MR. KNOWLES-KELLETT: No. This is what he
2 discussed. He was a party to it.

3 MR. ROMNEY: What he discussed with Carolyn Lutz
4 is hearsay.

5 MR. KNOWLES-KELLETT: No, it's not.

6 JUDGE STEINBERG: How is it hearsay? He's
7 testifying that --

8 MR. ROMNEY: What Carolyn Lutz tells him is
9 hearsay.

10 MR. KNOWLES-KELLETT: What Carolyn Lutz told him -
11 -

12 MR. ROMNEY: Yes. If you're talking about the
13 discussion it's I said, she said, I said, she said. That's
14 hearsay.

15 MR. KNOWLES-KELLETT: I think it comes in.

16 JUDGE STEINBERG: Overruled.

17 BY MR. KNOWLES-KELLETT:

18 Q What did you discuss with Carolyn Lutz?

19 A She was just telling me that she was --

20 MR. ROMNEY: Objection, Your Honor. That answer
21 that he started to give right now is hearsay.

22 JUDGE STEINBERG: I'll overrule it. It might
23 affect the weight that I give it, but it's not going to
24 affect the fact that the answer is going to be given. You
25 can ask Carolyn Lutz about the discussion.

1 What did you tell Carolyn Lutz? Why don't we
2 leave it at what did you tell Carolyn Lutz?

3 THE WITNESS: What I told Carolyn Lutz is I told
4 her I'd signed a license for Ronald, and she says I wouldn't
5 have done that because it's against the law. I said well, I
6 asked them that, and they said that everybody does it.

7 MR. ROMNEY: Move to strike, Your Honor. Hearsay.

8 JUDGE STEINBERG: I'll deny that.

9 BY MR. KNOWLES-KELLETT:

10 Q Did you have any similar conversation when you
11 originally applied for this license, or only at the renewal?

12 MR. ROMNEY: Objection, Your Honor. Eliciting
13 hearsay.

14 JUDGE STEINBERG: The same ruling. I don't really
15 understand the question because what I -- maybe I'm confused
16 because I understood that this conversation that you just
17 elicited testimony about referred to the original signing of
18 the application.

19 The second question is you're asking about
20 discussions of the renewal application, and you haven't
21 established that there were.

22 MR. KNOWLES-KELLETT: That's exactly where I went.
23 The time frame of this discussion was after the -- I think
24 the problem is my question --

25 JUDGE STEINBERG: Instead of telling him where it

1 is, ask him.

2 BY MR. KNOWLES-KELLETT:

3 Q My question related to this renewal application.
4 Did you understand my question to relate to this renewal
5 application?

6 A Would you repeat it?

7 Q Okay. The question of the discussion with anybody
8 at DLB related to the time frame August, 2000, this renewal
9 application. Is that the way you understood it?

10 A Is this the new one or this one, the first one?

11 JUDGE STEINBERG: Wait a minute. Let me ask him.
12 Are you confused? I am.

13 THE WITNESS: I am.

14 BY MR. KNOWLES-KELLETT:

15 Q Okay. When did the discussion that you just
16 described with Carolyn Lutz occur?

17 A The first signing of the license? Is that what
18 we're talking about?

19 Q No. I want to know when the discussion where she
20 said I wouldn't have done that and you said --

21 A Oh. I believe I talked to her over the telephone
22 because at that time we was working different hours. I
23 worked at night, and she worked during the day.

24 Q Okay. So that was at or about the time --

25 JUDGE STEINBERG: We still don't know the time

1 period.

2 BY MR. KNOWLES-KELLETT:

3 Q It was at or about the time of --

4 A I don't know. I don't know.

5 Q But it was more than two years ago?

6 MR. ROMNEY: Objection, Your Honor. Leading.

7 JUDGE STEINBERG: Sustained.

8 Let me see if I can. You signed two things,
9 correct?

10 THE WITNESS: Right.

11 JUDGE STEINBERG: You signed the original
12 application?

13 THE WITNESS: Right.

14 JUDGE STEINBERG: And that was whatever the date
15 it was. You picked up the application at Ron and Pat's
16 house.

17 THE WITNESS: Right.

18 JUDGE STEINBERG: You thought -- well, forget
19 about what you thought. Did you have a conversation with
20 Carolyn Lutz at or about the time that you picked up the
21 application and signed the application about the
22 application?

23 MR. ROMNEY: Objection, Your Honor. I don't
24 understand what time frame we're talking about.

25 JUDGE STEINBERG: Well, I explained it. I said at

1 about the time he picked up the original application from
2 Ron and Pat's house that he testified about.

3 MR. ROMNEY: As far as I understand the witness'
4 testimony to this point, he's only talked about this renewal
5 application, which is Exhibit 65 before the Court. There
6 has never been any testimony adduced, as far as I'm aware,
7 regarding any original application or the timing thereof.

8 JUDGE STEINBERG: Okay.

9 MR. KNOWLES-KELLETT: Yes, there has, Your Honor.

10 JUDGE STEINBERG: I believe there has, and I
11 believe we talked about the renewal application.

12 The testimony was, and if I'm wrong you tell me
13 because I don't want you to -- you know, don't be scared to
14 tell me I'm wrong because they're not scared. There's no
15 reason for you to be.

16 THE WITNESS: Right.

17 JUDGE STEINBERG: There was a renewal application,
18 and the renewal application is on page 3 of Exhibit 50.
19 Flip back one page.

20 THE WITNESS: This is the renewal.

21 JUDGE STEINBERG: And you said that this was
22 prepared by Ron?

23 THE WITNESS: Well, I picked this up at Ron's
24 office. I came in one morning early, and he called me in
25 his office and told me to sign this. He give me the money

1 and wanted me to write a check so it would be in my name at
2 my address in east Texas.

3 JUDGE STEINBERG: Okay.

4 THE WITNESS: Is this one I was supposed to be
5 discussing this with Carolyn Lutz? We discussed it both
6 times.

7 JUDGE STEINBERG: This meaning the renewal
8 application, page 3?

9 THE WITNESS: Right.

10 JUDGE STEINBERG: Okay. Now, this was the renewal
11 application, so there was an original application for a
12 license, and that had to be maybe years before the renewal
13 application?

14 THE WITNESS: Right. It was right after I went to
15 work at Metroplex. I think it's what, four years on the
16 license? Something like that.

17 JUDGE STEINBERG: I don't know.

18 THE WITNESS: A four year term, and then you have
19 to renew.

20 JUDGE STEINBERG: I have no idea. If you look at
21 page 2, do you see the date at the top on the right, License
22 Issue Date?

23 THE WITNESS: Right. 11-28-97.

24 JUDGE STEINBERG: Was that about the time you
25 started working for Metroplex?

1 THE WITNESS: I believe I started in 1995. The
2 first of 1995.

3 JUDGE STEINBERG: Okay. This I believe was the
4 original license.

5 MR. ROMNEY: Objection, Your Honor.

6 JUDGE STEINBERG: Was this the original license?

7 THE WITNESS: No. No. 2 don't show no signature.

8 MR. ROMNEY: We don't believe that it is. I mean,
9 that's my point.

10 JUDGE STEINBERG: Okay. I didn't know. There is
11 one before this?

12 MR. PEDIGO: Yes, Your Honor.

13 MR. ROMNEY: Yes, sir.

14 THE WITNESS: Page 1, I believe.

15 MR. PEDIGO: 11-28-97. That's the top of page 2.
16 That's the original license.

17 JUDGE STEINBERG: That's the one that I just
18 pointed to.

19 MR. HIGGS: This is a reissue of the original
20 license, which had a previous three year license term with
21 it.

22 JUDGE STEINBERG: Okay. Let me go back because
23 this is what I was referring to when I thought the witness
24 was talking or somebody was talking about the original
25 license. This is what I thought that everybody was

1 referring to.

2 Okay. Why don't I turn it back to Mr. Kellett,
3 and you can straighten us out, I hope.

4 MR. KNOWLES-KELLETT: Okay.

5 JUDGE STEINBERG: And then all the testimony about
6 the discussions with Ms. Lutz I think will be stricken
7 because I think the witness was confused. I certainly was
8 confused.

9 You're going to have to go back. Why don't you go
10 back and start from the first license and work your way up?

11 MR. KNOWLES-KELLETT: Okay.

12 BY MR. KNOWLES-KELLETT:

13 Q When do you recall signing the first license?

14 A I signed the first license at --

15 JUDGE STEINBERG: The application.

16 MR. KNOWLES-KELLETT: The application for license.

17 THE WITNESS: The application. At Patsy's house
18 in Sunnyvale --

19 MR. KNOWLES-KELLETT: Okay.

20 THE WITNESS: -- with Ron's presence.

21 BY MR. KNOWLES-KELLETT:

22 Q What year do you think that was?

23 A It appears it had to be 1997 sometime.

24 Q Maybe you can find it.

25 JUDGE STEINBERG: Don't tell the witness what he

1 can and can't do. Get the best of his memory.

2 MR. KNOWLES-KELLETT: Okay.

3 BY MR. KNOWLES-KELLETT:

4 Q It would like the best of your memory.

5 A Well, it could have been earlier than that because
6 he might not have turned them in at that time.

7 Q Okay.

8 A I don't know.

9 Q Okay. When did you sign the renewal application?

10 A Five or six months ago. Seven months ago.
11 Something like that.

12 Q Okay. If you would look at page 3? Does that
13 refresh your recollection?

14 A 8-11-00.

15 Q And if you look at page 4 on the check you wrote?

16 A That was 8-11. That's the same one.

17 Q Okay. So when you signed the --

18 A Right.

19 Q Okay. Did you want to sign this renewal
20 application?

21 MR. ROMNEY: Objection.

22 JUDGE STEINBERG: How is that objectionable? Did
23 you want to sign it?

24 MR. ROMNEY: It's leading.

25 JUDGE STEINBERG: I don't think so. I mean, I

1 don't know how relevant it is.

2 MR. ROMNEY: I withdraw my objection. I'm sorry.

3 JUDGE STEINBERG: Okay.

4 THE WITNESS: Should I answer the question?

5 BY MR. KNOWLES-KELLETT:

6 Q How did you feel about --

7 A I didn't want to sign it.

8 Q Okay. Why didn't you want to sign it?

9 A Because I knew they was already having trouble
10 over their T-band system over licenses that was signed, and
11 Sue was informing me not to sign them.

12 I went to David about this and told David I wanted
13 them out of my name. I didn't want to sign them. He said
14 well, go ahead and sign them, and I'll get them out of your
15 name in six months.

16 Q Okay. And by David do you mean David Brasher?

17 A David Brasher.

18 Q Okay. So at that time did you then go to Ronald's
19 office?

20 A Well, Ronald called me up the next morning and had
21 me to sign the papers.

22 Q Okay.

23 A I don't know if David knew about this or not. I
24 don't know.

25 Q So was it the next day?

1 A It was a day or two.

2 Q Okay.

3 A It was the following day or a day or two after
4 until he got the paperwork ready. I don't know.

5 Q Okay.

6 A I'm not sure.

7 Q Was that the day of the discussion we have
8 previously said? Ronald gave you the forms and everything?

9 A Right.

10 JUDGE STEINBERG: Wait a minute. Wait a minute.

11 MR. KNOWLES-KELLETT: Okay. Do you want me to go
12 back through?

13 JUDGE STEINBERG: No. You signed the application,
14 the renewal application, page 3, and --

15 THE WITNESS: Wrote a check.

16 JUDGE STEINBERG: And you wrote a check. Then
17 after that you got the five \$20s and the \$10?

18 THE WITNESS: He gave it to me as soon as I signed
19 the check. He handed it to me.

20 JUDGE STEINBERG: Okay.

21 BY MR. KNOWLES-KELLETT:

22 Q When you talked to David about this application,
23 did he tell you anything other than he would get it out of
24 your name?

25 MR. ROMNEY: Objection. Hearsay.